

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

MICHAEL KINGEN and KELLEY RAMSEY,
individually and on behalf of all others similarly
situated

Case No. 1:22-cv-01126-PLM-RSK

Plaintiffs,

Hon. Paul L. Maloney

v.

Magistrate Judge: Ray Kent

WARNER NORCROSS + JUDD LLP,

Defendant.

STIPULATION TO EXTEND DEADLINE TO RESPOND TO COMPLAINT

Plaintiffs Michael Kingen and Kelley Ramsey, and Defendant Warner Norcross + Judd LLP, through their counsel, seek an extension of the deadline to respond to the Complaint and, in support, state as follows:

1. This case was originally filed in the United States District Court for the District of Nevada, and was transferred to this Court on November 30, 2022.
2. While this case was pending in the District of Nevada, the law firm of Wood, Smith, Henning & Berman LLP was retained to represent Defendant.
3. Following the transfer to this District, however, Dykema Gossett has recently been retained to represent Defendant.
4. Newly-retained counsel for Defendant is working diligently to assess the Complaint and draft a responsive pleading. That said, given the recent retention, the press of business, and the holidays, counsel for Defendant requires additional time to respond to the Complaint.
5. The parties have stipulated that Defendant's first responsive pleading shall be filed no later than January 13, 2023.

6. The parties have not sought any prior extensions of deadlines in this case in this District.

7. This extension is sought in good faith and is not intended to cause undue delay. No party in this action will be prejudiced by this extension. The extension does not interfere with any Case Management Plan, or other case deadlines.

8. A proposed order granting this stipulation is attached.

SO STIPULATED:

/s/ Scott Edward Cole (w/permission)

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Defendant.

ORDER EXTENDING DEADLINE TO RESPOND TO COMPLAINT

Upon the stipulation of the parties and the Court being otherwise fully advised in the
premises:

IT IS ORDERED that Defendant's first responsive pleading shall be filed no later than
January 13, 2023.

SO ORDERED.

DATED: _____

Hon. Paul L. Maloney